



Code of Conduct

Purpose

This Code of Conduct ("the Code") reflects SEA Water's (SEA's) dedication to environmental stewardship, the protection of human rights, and ethical business practices. By adhering to this Code, SEA foster a positive, inclusive, and respectful work environment that aligns with core values and organisational objectives.

Scope and applicability

This Code applies to all employees of SEA Water, regardless of their position or location. Contractors and temporary staff are also expected to adhere to this Code while working for or on behalf of the company.

If you have questions concerning the meaning or application of this Code of Conduct, please contact a relevant manager or the policy owner at impact@drinkseawater.com.

Core values

SEA's core values reflect our pioneering spirit and also encompass our commitment to doing business with integrity, transparency, and responsibility.

At SEA, we're unafraid to challenge the status quo. We embrace bold actions and ideas that drive innovation, ensuring our efforts leave a lasting positive impact on people and the planet. Being bold does not mean being careless.

We approach our mission with creativity and a sense of humor, making desalinated drinking water engaging and approachable for everyone. We believe the transformative power of desalinated drinking water should reflect a positive and forward-thinking approach. We're visionary, not impractical or dismissive.



Transparency and authenticity are at the heart of our work. We are dedicated to clear communication and genuine actions, inspiring trust and optimism as we champion an innovative vision for our oceans passionately, without being preachy or stubborn.

Professional conduct

Integrity: Act with integrity by upholding honesty and authenticity in every action. Make thoughtful decisions and seek guidance from colleagues and peers when faced with challenges. Proactively avoid conflicts of interest and disclose any potential concerns without hesitation.

Responsibility: Act responsibly by treating all colleagues, partners, and stakeholders with respect, fairness, and inclusivity. Lead by example in safeguarding our planet and championing sustainable water desalination practices.

Transparency: Act transparently by staying true to yourself, the company, and our audience. Communicate openly and authentically, ensuring transparency while safeguarding confidential information and intellectual property.

Fair competition

SEA is committed to competing ethically and fairly in all markets. We always adhere to applicable competition laws and regulations, avoiding any anti-competitive practices. This includes refraining from activities such as collusion or price-fixing, and not engaging in unethical practices like false advertising or spreading misinformation. All employees are expected to respect competitors' patents, trademarks, and trade secrets, and to avoid predatory pricing or any practices that harm competition or restrict customer choice. If any suspicious behavior is witnessed, employees must report it immediately.



Labour and human rights

SEA is committed to upholding and promoting human rights across all areas of our operations. We foster a workplace that values non-discrimination, inclusion, and respect for the dignity of every individual.

The Code is based on internationally recognised principles, including the UN Guiding Principles on Business and Human Rights (UNGO), the Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

Employment is freely chosen: All employment at SEA is freely chosen. We do not engage in or tolerate any form of forced, bonded, or involuntary labor. Employees have the right to terminate their employment with reasonable notice.

No child labour: SEA does not employ individuals below the legal minimum working age, in accordance with the standards set by the International Labour Organization (ILO) and applicable local laws.

Equal treatment and non-discrimination: SEA prohibits discrimination or harassment based on race, gender, religion, sexual orientation, disability, or any other characteristic protected by law. All employees and stakeholders are expected to foster a respectful and inclusive environment. Any person subject to this Code of Conduct who harasses, discriminates, or creates a hostile work environment for another person may be subject to disciplinary action, up to and including termination of employment.

Freedom of association and collective bargaining: We respect the rights of employees to form or join trade unions and engage in collective bargaining. SEA Water ensures these rights can be exercised freely, without fear of retaliation or interference.

Health, safety, and well-being: We provide a safe and healthy workplace for all employees. SEA takes proactive steps to minimize risks, promote well-being, and comply with all relevant health and safety standards. SEA supports the needs of all employees, including providing appropriate accommodations for breastfeeding mothers, such as flexible break times.

Fair working hours and wages: We follow all applicable labour laws regarding working hours, wages, and benefits. SEA is committed to ensuring fair compensation and preventing excessive working hours or unreasonable demands.



Bribery and corruption

SEA maintains a zero-tolerance policy for bribery and corruption. Employees must act with integrity and avoid any behaviour that could be perceived as corrupt.

Under this Code a bribe includes financial or other advantages which are given, promised, offered, accepted, requested or received with the intention that a specific activity should be performed. You are not allowed to accept bribes in any circumstances. In addition, you are not allowed to offer bribes for or on behalf of the Company to any organisation or person, whether employed privately, in the public sector or in an organisation.

Ethical Marketing

SEA believes marketing and communication should inspire action while staying grounded in honesty, transparency, and respect for our audience. We are committed to clear, accurate, and transparent communication about our operations and products.

Precise, verifiable, and substantiated claims: All environmental and social claims - in advertising, on packaging, in pitch materials, on our website, or in press - must be accurate, specific, and supported by reliable data or scientific evidence. Claims about product impact must be grounded in our LCA data, verified baselines, or third-party assessments; where data is not yet finalised, claims must be appropriately qualified. Comparative claims are only used when the methodology and comparison basis are clearly documented. Superlatives and absolute claims are avoided unless fully substantiated. When underlying data changes, existing materials are updated accordingly.

Truthful, transparent, and accountable about impacts - positive and negative: We communicate honestly about the full picture of our impact, including where we are still improving. We do not use impact communications to obscure trade-offs or omit material negative information, and we distinguish clearly between achieved outcomes and aspirational targets. We avoid greenwashing in all forms - including vague language without substantiation, or framing that overstates environmental benefit. The same standards apply across all contexts, including investor and partnership communications.



Ethical guidelines for sensitive channels and practices: We do not use manipulative or exploitative techniques in any marketing or PR activity. When communicating about communities or water access projects, we apply dignity standards and do not use beneficiary stories or images without informed consent. Social media and influencer partners representing SEA are held to the same standards. SEA does not engage in astroturfing or endorsements disguised as organic advocacy.

Environmental responsibility

Employees are expected to contribute to SEA's environmental goals by promoting sustainable practices and supporting eco-friendly initiatives in the workplace in addition to supporting SEA's long-term mission. Our **environmental policy** can be found [here](#).

Stakeholder engagement

SEA commits to inclusive, proactive, and respectful engagement with all stakeholder groups. We actively seek out diverse perspectives to inform our strategy and ensure our operations reflect the needs and expectations of those we impact.

SEA Water has identified and prioritised its stakeholders based on the degree to which they are affected by our operations and the degree to which they can influence our impact. Our primary stakeholders are employees, suppliers and production partners, customers and hospitality partners, communities at project sites, investors, and the local and global environment. Secondary stakeholders include industry peers, civil society organisations, trade associations, and regulatory bodies at Dutch and EU level.

We use a combination of engagement mechanisms tailored to each stakeholder group. Formal surveys and/or interviews with key stakeholders are conducted every three years, supported by annual desk research to maintain up-to-date insights. Where operationally possible or relevant to business development, interviews will be conducted more frequently.

This ongoing engagement lays the foundation for our sustainability strategy and guides both new and existing initiatives.



As part of our commitment to meaningful stakeholder involvement, SEA empowers employees to play an active role in our social impact initiatives. Team members are encouraged to nominate and vote on charitable organizations to receive company donations, ensuring our giving reflects the values and priorities of our people. This includes regular, open conversations about potential future impact partners, recognising that these partners not only receive our donations but also shape how we create value beyond our business.

For a full overview of how each stakeholder group is engaged in the context of our climate and impact commitments, see our [Climate and Impact Action Plan](#).

Confidentiality and data protection

All employees working within SEA, in whatever capacity, are subject to strict confidentiality obligations with regard to all data, knowledge or know-how that comes to their knowledge in the performance of their position.

Employees must comply with applicable data protection laws and company policies, ensuring the confidentiality and integrity of personal and sensitive information. Our **privacy policy** can be found [here](#).

Conflict resolution

SEA encourages a respectful approach to resolving conflicts. Employees are expected to use appropriate channels for resolving disagreements or grievances, such as HR or appropriate manager, in a fair and unbiased manner.

Anonymous reporting

Employees can report concerns related to unethical behaviour, harassment, or other violations through anonymous channels to ensure a safe and confidential reporting process. Our **whistleblower policy** can be found [here](#).